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 9 Attorneys for Petitioner Stanford Hospital & Clinics  
 and Lucile Packard Children's Hospital

8 **UNITED STATES DISTRICT COURT**  
 9 **NORTHERN DISTRICT OF CALIFORNIA**

11 **STANFORD HOSPITAL & CLINICS and**  
 12 **LUCILE PACKARD CHILDREN'S**  
 13 **HOSPITAL**

14 **Petitioners,**

15 **v.**

16 **SERVICE EMPLOYEES**  
 17 **INTERNATIONAL UNION, LOCAL 715**

18 **Respondent.**

19 **Case No: C-07-5158-MMC**

20 **DECLARATION OF LAURENCE R.**  
 21 **ARNOLD IN SUPPORT OF**  
 22 **MOTION FOR RELIEF FROM**  
 23 **CASE MANAGEMENT SCHEDULE**

24 **Judge: Hon. Maxine M. Chesney**

25  
 26 1. I am an attorney at law, licensed to practice in the State of California and before  
 27 this Court. I am a partner with the law firm of Foley & Lardner LLP, counsel of record for  
 28 Petitioners Stanford Hospital & Clinics and Lucille Packard Children's Hospital (the  
 "Hospitals") in the above-captioned case. I have personal knowledge of the matters stated herein  
 and, if called to do so, could and would testify of my own personal knowledge to the facts set  
 forth below.

29  
 30 2. I am lead trial counsel for the Hospitals in the above-captioned case.

31  
 32 3. Between January 17, 2008 and February 8, 2008, I will be traveling abroad. My

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33 **DECLARATION OF LAURENCE R. ARNOLD**  
 34 **IN SUPPORT OF MOTION FOR RELIEF FROM CASE MANAGEMENT SCHEDULE**  
 35 **CASE NO. C-07-5158-MMC**

1 travel arrangements have been in place for approximately half a year, and I have already  
 2 committed to flight, hotel, and other travel arrangements.

3  
 4. On the week beginning February 18, 2008, I am scheduled to appear for jury duty  
 5 in the United States District Court for the Northern District of California.

6  
 5. On December 26, 2007, I conferred by telephone with Vincent A. Harrington Jr.,  
 7 lead trial counsel for Respondent Service Employees International Union, Local 715 (the  
 8 "Union"). During that conference, Mr. Harrington and I discussed the filing of a Stipulated  
 9 Motion For Relief From Case Management Schedule, which had been previously provided for  
 10 Mr. Harrington's review. Mr. Harrington stated that he had no objection to the proposed  
 11 stipulated motion. Mr. Harrington and I also agreed that it is likely that this case will be resolved  
 12 through the filing of a dispositive motion, and that, for that reason, it is unlikely that formal  
 13 discovery and a trial will be necessary in this case. We agreed that, in light of these facts, it  
 14 would be economical to postpone the holding of an Initial Case Management Conference for an  
 15 extended period, which would allow the Court to hear and decide a dispositive motion, and  
 16 which could or would eliminate the need for the Court to hold the Initial Case Management  
 17 Conference and issue a Case Management Order.

18  
 19 I declare under penalty of perjury under the laws of the State of California that the  
 20 foregoing is true and correct.

21 Dated: December 28, 2007

22  
 23   
 24 LAURENCE R. ARNOLD